From: Chaves, Francisco
Sent: Tue, 15 Feb 2022 23:32:16 +0000
To: Bradshaw, Kelly;Beaudoin, Denis
Subject: Recap of meetings with Banks and CROPs

Hi Kelly and Denis,

Quick recap of the meeting that took place today. Please make the necessary changes if you see I missed anything.

For your information Kelly H is awaiting final go ahead before she send the information to the banks.

Meeting with reps from the Financial Institutions (14h00).
RCMP: Supt Bradshaw, DG and Supt Beaudoin, Dir

Key takeaways:

- RCMP informed the FI's that Emergency Measures Act was imminently going to be signed today.
- Informed that RCMP will provide names of entities as soon as the act in signed off (as early as tonight).
- RCMP will provide a central point of contact that will channel the names of the entities to the FI's.

- The FI's proposed the 'Grid Alert' process, under the Canadian Bankers Association (CBA), as a mean to share information to them. Another possibility to share would be direct email communication to their 'Legal Order' inbox. The FI's will discuss among themselves, along with consulting their legal departments, as to what is the best way to channel information to them and inform the RCMP NHQ within the following hours.

- At this moment FI's propose Personal Info. @cba.ca) and Personal Info. Personal Info. @hsbc.ca) as point of contacts for the FI's

- The FI's asked whether the onus of reporting information or acting on EMA obligations relied on them. RCMP reps indicates that the banks have the onus of detecting and freezing assets such they identify client entities. Identification of entities should be done based on the criteria's set on the EMA.

- Regarding the freezing of assets, RCMP reps highlighted that the measures are not about confiscation but rather disruption. To this effect, it was suggested that asset should be frozen as long as the emergency measures are in effect.

- FI's were concerned about scenarios where 'joint accounts' could be frozen, thus impacting individuals not involved in the protests.

- RCMP highlighted that law enforcement could resort the EMA at different stages regionally depending on how removal of protest evolves. FI's acknowledged the fact that their actions under the act could affect LE's negotiations in the field.

Meeting with Fed CROPS (15h30)
RCMP: Supt Bradshaw, DG and Supt Beaudoin, Dir

Key takeaways:

- RCMP reps informed CROPS officers about the imminent coming into effect of the EMA. CROPS officers were informed that the act puts the onus on the financial institutions to identify, report and freeze assets as it applies to the scope of the act. At this moment, it is not well known what type of information the banks will provide back to law enforcement or FINTRAC, however information is expected to flow fairly soon.

- CROPS officers were informed that the first wave of disclosures to the financial institutions regarding entities involved in the protest is expect to occur this evening.

- The RCMP and the OPP/Ottawa Police have been in conversations to help streamline the request into the banks. As such, the OPP has accepted to use NHQ as conduit to communicate and share information with the banks. CROPS officers were encouraged to get in contact with their provincial counterparts to help streamline the information flow into the banks. Officers were encouraged to refer to the act in order to determine if the act covers any situations that might be taking place in their region.

- NHQ recognized that certain jurisdictions may not result to the measures in the act and the removal and negotiation with the protestors in their region continues.

- Cpl Kelly Hughes is the point of contact between the banks and RCMP.

- Officers discussed the notion of freezing assets. NHQ highlighted that the freezing of assets is not the same as asset confiscation and the onus lies at the financial institutions to identify, report and acting while the act in under effect.

- In order to assist with due diligence and intelligence preparation before disclosing other entities names, National division SII has agreed to stand up a team that will coordinate with Ottawa Police Services/OPP.

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